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Attorneys for Claimants Represented

by Barnes Law Group, LLC,

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No. 23-12825 (MBK)

**JOINDER OF MOTIONS TO DISMISS BY GEORGIA STATE COURT
CLAIMANTS REPRESENTED BY THE BARNES LAW GROUP, LLC**

The Georgia State Court Claimants Represented by The Barnes Law Group, LLC (“Georgia Claimants”) respectfully move to dismiss Debtor’s second bankruptcy petition filed in this case on April 4, 2023 pursuant to Section 1112(b) of the Bankruptcy Code and Rule 9011 of the Bankruptcy Rules. In support of this motion, and in the interests of judicial efficiency, the Georgia Claimants adopt and incorporate the arguments set forth by other parties to these proceedings as follows:

1. Tort Claimant Committee (Dkt. 286, filed on April 24, 2023);
2. Paul Crouch (Dkt. 346, filed on April 28, 2023);
3. Ad Hoc Committee of States (Dkt. 350, filed on April 28, 2023);
4. MRHFM’s Plaintiffs (Dkt. 358, filed on April 28, 2023);
5. US Trustee (Dkt. 379, filed on May 1, 2023); and
6. Arnold & Itkin (Dkt. 384, filed on May 1, 2023)

Georgia Claimants do not restate those arguments here, and instead emphasize that under any interpretation the holdings and precedential value of *LTL Mgmt., LLC v. Those Parties Listed on Appendix A to Complaint (In re LTL Mgmt., LLC)*, 58 F.4th 738, 64 F.4th 84, 747 (3d Cir.

2023), make clear that Debtor and its non-debtor corporate parents cannot *manufacture financial distress* solely for the purpose avoiding their tort liability through the bankruptcy system.

WHEREFORE, the Georgia Claimants respectfully request the Court dismiss with prejudice Debtor's second bankruptcy petition this case.

Dated: May 9, 2023

**McMANIMON, SCOTLAND
& BAUMANN, LLC**
*Attorneys for Claimants Represented
by Barnes Law Group, LLC*

By: /s/ Sari B. Placona
SARI B. PLACONA